With regard to the proposed changes to the rules for Amateur Radio Service volunteer examinations, please note that the VE system has been in operation without major problems for many years using the current rules, which would seem to indicate that the proposed rule changes would be seeking to fix a problem that does not exist.

I have been a VE in the ARRL-VEC program for several years. Currently I am the VE Liaison for the Motor City Radio Club, in charge of overseeing our exam sessions and reporting the results of the same to the VEC. We have about 20 VEs and offer 9 testing opportunities per year. We all pride ourselves on the integrity of our operation and we all realize that the future of amateur radio as well as that of the overall VE system relies upon the rigid adherence of each VE to the highest standards of probity.

The rules in question are there to insure that these standards are met by all. It is a reinforcement of this to require that sessions be publically announced and that session reports be submitted in a timely manner. As for the notion that penalties for gaming the system should be lessened, it seems to me that should any VE attempt to fraudulently misuse the trust that the Commission has placed in him/her that person will have demonstrated characteristics that call into question his/her integrity generally and such penalties as this should bring are fully justified.

I therefore urge the Commission to reject the idea of changing the rules with regard to VE exams in the Amateur Radio Service, there being no particular pressing reason to change them and every reason to refrain from fixing things that are not broken.

In the event the Commission decides to go forward with the changes I would urge that in the R & O specific authorization be granted to the several VEC organizations to retain these requirements with regard to their individual programs with authority to suspend the credentials of VEs in their programs who are bfound by them to be in violation.

Sincerely,

Bruce W. Moyer - KI8GR